

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Harold Eugene OUTLEY, IV

Case: 2:22-mj-30406

Assigned To : Unassigned

Assign. Date : 9/21/2022

Case No.

Description: RE: SEALED MATTER  
(EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.


On or about the date(s) of March 2021 through April 2022 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 USC § 922(a)(1)(A)

Engaging in distribution of firearms without a license

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

Steven J. Allick, Special Agent (ATF)

*Printed name and title*Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: September 21, 2022City and state: Detroit, Michigan*Judge's signature*

Hon. Anthony P. Patti, United States Magistrate Judge

*Printed name and title*

Save

Print

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

**I. INTRODUCTION AND AGENT BACKGROUND**

I, Steven Allick, being first duly sworn, hereby deposes and states as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been since May of 2014. I am currently assigned to the Detroit Field Division. I completed 26 weeks of training, which was comprised of the Criminal Investigator Training Program and the ATF Special Agent Basic Training program at the Federal Law Enforcement Training Center in Glynco, Georgia. I received extensive training on firearms identification, common scenarios involving firearms and narcotics trafficking, and identification and effects of controlled substances. Additionally, I received training on undercover investigations related to firearms and narcotics trafficking, which included investigative techniques and common subject behavior.

2. During my employment with ATF, I have participated in numerous investigations of criminal violations relating to firearms, violent crime, and narcotics. I have participated in various aspects of criminal investigations, including interviews, physical surveillance, and obtaining and executing search warrants. I am familiar with and have employed various investigative methods,

including electronic surveillance, visual surveillance, search warrants, and the utilization of confidential informants.

3. The facts in this affidavit come from my personal observations, interviews conducted by myself and/or other law enforcement agents, review of relevant police reports and information from others who have personal knowledge of the events and circumstances described herein, and my training and experience. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that Harold Eugene OUTLEY IV (DOB: XX/XX/1998), has violated 18 U.S.C. § 922(a)(1)(A) (engaging in business of dealing in firearms without a license).

## **II. PROBABLE CAUSE**

5. In April 2022, I reviewed four ATF Firearms Trace Summary Reports relating to Harold Eugene OUTLEY IV. An ATF Firearms Trace Summary Report is a report that documents who originally purchased a firearm and who was later found to be in possession of the same purchased firearm. To date, ten of the firearms purchased by OUTLEY IV were recovered in the possession of individuals who were not OUTLEY IV.

6. For example, on April 1, 2021, OUTLEY IV purchased a Glock, Model 43X, serial number BPBG212, 9mm pistol from Dunham's Sports, a Federal Firearms Licensee (FFL) in Allen Park, MI. Only 23 days later, on April 26, 2021, the Detroit Police Department recovered the Glock pistol from a person who was not OUTLEY IV. The individual who possessed the Glock pistol on April 26, 2021 was a convicted felon and was therefore prohibited from possessing and purchasing firearms under federal law. I know individuals that cannot legally purchase firearms from federal firearms licensees will often ask individuals with a clean background to purchase firearms on their behalf.

7. Thereafter, in April and May 2022, I reviewed ATF Forms 4473 relating to firearms purchased from Dunham's Sports in Allen Park and Dearborn Heights, MI by OUTLEY IV from March 2021 through April 2022. An ATF Form 4473 documents an individual's purchase of firearms from a Federal Firearms Licensee (FFL). OUTLEY IV purchased 27 firearms from Dunham's Sports, but did not register any of the handguns with the State of Michigan, as required by state law.

8. From either the Dunham's Sports in Allen Park, MI or Dearborn Heights, MI, OUTLEY IV purchased the following 27 firearms:

- i. March 16, 2021, Canik, model TP9SF, 9mm pistol, serial number 20AT28341;

- ii. April 1, 2021, Glock, model 43X, 9mm pistol, serial number BPBG212;
- iii. April 3, 2021, Smith & Wesson, model SD40VE, .40 caliber pistol, serial number FDC4698;
- iv. April 7, 2021, Taurus Arms, model G2C, 9mm pistol, serial number ACB585348;
- v. April 14, 2021, Sig Sauer, model P320, 9mm pistol, serial number M18A011043;
- vi. April 27, 2021, Glock, model 19, 9mm pistol, serial number BTCM288;
- vii. April 30, 2021, Taurus Arms, model G2C, 9mm pistol, serial number ACC702783;
- viii. May 10, 2021, Springfield Armory USA, model XDE-9, 9mm pistol, serial number BA230299;
- ix. May 19, 2021, Smith & Wesson, model, SD9VE, 9mm pistol, serial number FDF2002;
- x. May 27, 2021, Smith & Wesson, model M&P 9 Shield EZ, 9mm pistol, serial number NKH4696;
- xi. June 5, 2021, Smith & Wesson, model SD40VE, .40 caliber pistol, serial number FDF9985;
- xii. June 10, 2021, Canik, model TPL9 Elite, 9mm pistol, serial number 21CB15198;
- xiii. June 16, 2021, Glock, model 44, .22LR pistol, serial number AFGF947;
- xiv. August 8, 2021, Taurus Arms, model G2C, 9mm pistol, serial number ACG984722;
- xv. August 18, 2021, Taurus Arms, model G2C, 9mm pistol, serial number ACE875419;

- xvi. August 21, 2021, Taurus Arms, model G2C, 9mm pistol, serial number ACE875195;
- xvii. September 9, 2021, Glock, model 20Gen4, 10mm pistol, serial number BTSB494;
- xviii. September 15, 2021, Taurus Arms, model G2C, 9mm pistol, serial number ACH154383;
- xix. October 16, 2021, Glock, model 21GEN4, .45 caliber pistol, serial number AFWY884;
- xx. October 30, 2021, Smith & Wesson, model SD40VE, .40 caliber pistol, serial number FDK6160;
- xxi. October 30, 2021, Taurus Arms, model G2C, 9mm pistol, serial number ACK406065;
- xxii. February 18, 2022, Taurus Arms, model G2C, 9mm pistol, serial number ACK406028;
- xxiii. March 8, 2022, Glock, model 43, 9mm pistol, serial number AFWG383;
- xxiv. April 3, 2022, Smith & Wesson, model SD40VE, .40 caliber pistol, serial number FDM5630;
- xxv. April 3, 2022, Radical Firearms, model RF-15, 5.56mm rifle, serial number 2-009243;
- xxvi. April 15, 2022, Taurus Arms, model G2C, 9mm pistol, serial number ADA886431; and
- xxvii. April 15, 2022, Smith & Wesson, model SD40VE, .40 caliber pistol, serial number FEA0565.

9. On May 24, 2022, I conducted an interview with OUTLEY IV relative to this investigation. OUTLEY IV stated he was purchasing firearms for individuals who he did not know but would “bump” into around the neighborhood.

OUTLEY IV stated he would make at least \$1,000.00 per firearm he bought/sold. OUTLEY IV stated he had about three repeat customers. OUTLEY IV stated he probably made “15K” (\$15,000) in a month selling firearms. OUTLEY IV stated he made about “30-50K” (\$30,000-\$50,000) total selling firearms. OUTLEY IV stated the last time he had a job was 2018 and has not worked since. OUTLEY IV stated he recently travelled to Kentucky to begin working. OUTLEY IV stated he did not know that he needed to apply for a license to lawfully deal firearms. I inquired about OUTLEY IV providing false information on the ATF Form 4473 to purchase the firearms. OUTLEY IV stated he is the actual purchaser when he buys the firearms. OUTLEY IV stated he is using his own money to buy the firearms and it is his firearm until he decides to sell it.

10. On May 25, 2022, ATF executed two federal search warrants at residences associated with OUTLEY IV. During the searches, law enforcement recovered three empty firearm boxes with firearm serial numbers on the outside, Michigan Pistol Sales records in the name of Harold Eugene OUTLEY IV, and other items. According to the ATF Forms 4473 I have reviewed, OUTLEY IV purchased two of the firearms associated with the empty firearm boxes recovered by law enforcement.

11. In August 2022, I queried all 27 firearms purchased by OUTLEY IV from Dunham’s Sports. Of the 27 firearms purchased by him, law enforcement has

recovered 10 firearms to date from individuals other than OUTLEY IV. These recoveries include the following:

12. Records show that on June 20, 2021, OUTLEY IV purchased a Canik, 9mm pistol, serial number 21CB15198 that he did not register with the state of Michigan. A National Integrated Ballistic Information Network (NIBIN) report indicates that this firearm was traced two (2) shooting incidents. First, on August 25, 2021, a drive by shooting occurred at XXXXX Outer Drive, Detroit, MI. Law enforcement reports indicate that there were multiple shooters, and twenty 9mm casings were recovered from the scene. The NIBIN report indicates that at least one of the casings tied to the firearm purchased by OUTLEY IV two-and-a-half months earlier. Then, two weeks later on September 4, 2021, the firearm was recovered at the scene of a shooting at a Got Burger restaurant. The firearm was not believed to have been used in the shooting (in was simply recovered under a bench in the lobby of the Got Burger where the shooting occurred).

13. Records also show that on September 15, 2021, OUTLEY IV purchased a Taurus, 9mm pistol, serial number ACH154383, that he did not register with the state of Michigan. Just over a month later, on October 17, 2021, the firearm was in the possession of Devontay Norwood. According to investigation reports, Mr. Norwood got into a dispute with a gentleman named Andre Cooper; according to a witness, the two individuals then pulled out weapons



and started shooting at each other. Mr. Norwood was arrested two days later—on October 19, 2021—with the Taurus 9mm firearm in his waistband.

14. As was documented above, OUTLEY IV has purchased multiple handguns—many of similar or identical make and model—over a 14-month period. Based on my training and experience, and interaction with the firearms trade, none of the firearms purchased by OUTLEY IV have any collector’s value. In fact, many of the firearms that OUTLEY IV purchased are inexpensive and are among the most commonly recovered crime guns in the Detroit area. I know, based on my training, experience and past firearms trafficking investigations, that individuals who purchase multiples of inexpensive handguns, particularly in a short period of time, are often illegal firearms dealers. I know from my training and experience, having traced numerous firearms, and my interaction with firearms and the firearms industry, that a majority of firearms purchased by OUTLEY IV fit into this illegal trafficking category.

15. I spoke with ATF Industry Operations Investigator Patrick Curry who stated OUTLEY IV does not have a federal firearms license nor did OUTLEY IV ever have a federal firearms license, which would permit OUTLEY IV to repetitively buy and sell firearms.

### III. CONCLUSION

16. Based on this information, there is probable cause to believe OUTLEY IV has violated 18 U.S.C. § 922(a)(1)(A) (engaging in business of dealing in firearms without a license). This violation occurred in the Eastern District of Michigan.

Respectfully submitted,



---

Steven Allick, Special Agent  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



---

HONORABLE ANTHONY P. PATTI  
UNITED STATES MAGISTRATE JUDGE

DATE: September 21, 2022